

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the matter of

Carriage of the Transmissions  
of Digital Television Broadcast Stations

Amendments to Part 76  
of the Commission's Rules

**CS Docket No. 98-120**

**MOTION FOR EXTENSION OF TIME**

The Association of Local Television Stations, Inc. ("ALTV"), by its counsel and pursuant to Section 1.46 of the Commission's Rules and Regulations, 47 CFR §1.46, hereby respectfully requests an extension of time in which to file comments and reply comments in the above-captioned proceeding.<sup>1</sup> Comments currently are due to be filed on September 17, 1998. Reply comments are due on October 30, 1998. ALTV urges the Commission to extend the comment and reply comment dates to October 16, 1998, and November 30, 1998, respectively.

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<sup>1</sup>*Notice of Proposed Rule Making*, CS Docket No. 98-120, FCC 98-153 (released July 10, 1998 [hereinafter cited as *Notice*]).

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ALTV at the outset restates its unwavering support for *prompt* adoption of rules requiring cable systems to carry the new DTV stations spawned by the Commission's massive effort to implement a timely and successful transition to an all digital local broadcast television system.<sup>2</sup> Nothing could more effectively stifle the deployment of digital television and prolong the transition than the inability of cable subscribers to receive local television stations' digital signals on their cable systems. Regardless of the acknowledged complexities inherent in fashioning DTV must carry rules, the overarching fact remains that lack of consumer access to DTV signals will undo all the Commission has done over the past decade to spur DTV development and deployment. ALTV, therefore, itself would oppose any material delays in the conduct of this proceeding.

Nonetheless, the brief extension sought herein would enable ALTV to provide a more comprehensive and knowledgeable response to the Commission's *Notice*. It would enable the ALTV Board of Directors to consider and debate the many critical issues of implementation raised in the *Notice*. Unless the extension is granted, the board would be denied a meaningful opportunity to discuss and offer the Commission its best thinking on the issues. The ALTV board is scheduled to meet on September 28 and 29, 1998, just eleven days *after* the current comment

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<sup>2</sup> As the Chairman has stated, "The FCC must continue to move expeditiously on the remaining DTV issues, such as must carry coverage...." Statement of FCC Chairman William Kennard On Adopting Final Dtv Allotments And Rules (February 18, 1998).

deadline in this proceeding. The extension of the comment date to October 16, 1998, would enable ALTV to prepare comments fully reflective of the board's deliberations. ALTV emphasizes that face-to-face discussions of these issues with such expert input as the board may elicit are essential to development of positions which reflect sound business and technical (*i.e.*, not just legal) considerations.<sup>3</sup> Regrettably, scheduling such a meeting between July 10, 1998, and a date sufficiently early in September to permit preparation of comments reflecting the outcome of the meeting is problematic at best. August typically is pock-marked with vacations. This only compounds the normal difficulties of scheduling a meeting on short notice.<sup>4</sup> Therefore, ALTV can provide more enlightened and responsive comments with respect to the myriad of complex issues raised in the *Notice* only if the comment date is extended to a date at least several weeks after ALTV's board meeting in late September.

More illuminating comments from ALTV, which represents the interests of stations most likely to rely on must carry rules to secure carriage of their digital signals, in turn would produce a more complete record and thereby assist the Commission in adopting rules which will best promote the public interest in timely

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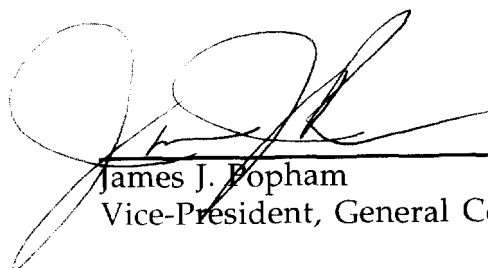
<sup>3</sup>ALTV rejected the notion of a conference call in lieu of a meeting in light of the inherent limitations of conference calls (*e.g.*, limited time, scheduling difficulties over time zones, uncertain participation, distraction and interruption of participants, inability to use visual aids, etc.).

<sup>4</sup>ALTV's meeting dates and site were determined much earlier this year in order to allow sufficient time to reserve appropriate hotel accommodations.

development of digital television service.<sup>5</sup> ALTV submits that the benefits of a richer record far outweigh the nominal delay in adoption of rules in this proceeding.

In view of the above, ALTV respectfully urges the Commission to extend the comment and reply comment dates in this proceeding to October 16, 1998, and November 30, 1998, respectively.

Respectfully submitted,



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Vice-President, General Counsel

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Stations, Inc.**

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August 12, 1998

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<sup>5</sup>See Notice at ¶33. ALTV's membership includes independent stations and stations affiliated with the Fox, PaxTV, UPN, and WB networks.